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December 31, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Singh v. Topline NYC Contracting Inc., et al.
Case No.: 1:25-cv-776 (NCM) (VMS)

Dear Judge Scanlon:

This firm represents Plaintiff Joginder Singh (hereinafter the “Plaintiff”) in the above-referenced case. Plaintiff has attempted to meet-and-confer with opposing counsel regarding discovery in accordance with this Court’s Order dated December 19, 2025. Regrettably, Defendants’ counsel has not been responsive to Plaintiff’s requests. This letter was to propose a detailed discovery schedule that includes expert discovery.

Defendants served discovery demands on May 25, 2025. Plaintiff provided responses and objections together with their first production of documents on July 25, 2025. Plaintiff served his discovery demands on July 8, 2025. Defendants did not provide responses and objections on the grounds that Plaintiff did not serve the demands by the date specified in the scheduling Order, which contention this Court rejected at the December 19, 2025 conference.

Finally, Plaintiff respectfully seeks an extension of time to respond to Defendants’ counterclaim. This request is made because your undersigned perfected a Second Circuit brief due on Monday, December 22, 2025, conducted a deposition all day on Tuesday, December 23, 2025, and is engaged in preparation for depositions in Superb Motors Inc v. Deo, Case No.: 2:23-cv-6188 (JMW) the following day for approximately twenty (20) depositions taking place in January. Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
December 31, 2025

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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